

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

EDWIN VILLANUEVA
CARRASQUILLO,
Defendant.

CRIMINAL NO. 99-261 (HL)

**REQUEST FOR DISCOVERY PURSUANT TO
RULE 32.1 OF FEDERAL RULES OF CRIMINAL PROCEDURE**

HON. HECTOR LAFFITTE
UNITED STATES DISTRICT JUDGE
FOR THE DISTRICT OF PUERTO RICO

COMES NOW Mr. Edwin Villanueva-Carrasquillo, the defendant herein, represented by the Federal Public Defender for the District of Puerto Rico, and before this Honorable Court respectfully states and prays as follows:

1. In order to present an effective defense, it is vitally important that defense counsel receive the following information prior to defendant's Order to Show Cause hearing on May 5th 2005 at 9:15 am.

2. *Federal Rule of Criminal Procedure 32.1 (a)(2)(B)* provides that a person whose term of supervised release is to be revoked has the right to "disclosure of the evidence against the person." The following information is requested:

- a) The name of the doctor, psychological and or drug treatment program or programs that the defendant was referred to by the U. S. Probation Office.
- b) The appointments given to the defendant by the doctor or treatment program.

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- c) The notes (chronos) of the Probation Officer of the meetings held with the defendant.
- d) Copy of Presentence Investigation Report.
- e) Copies of any and all documents pertaining to the defendant's criminal charges at the state level in the Probation Officer's possession.
- f) Any and all other information directly related to the reasons for revocation that the U.S. Probation Office included in their motion.

3. It is respectfully requested that an order be issued by this Honorable Court in which it order the Probation Officer to provide the information requested by defendant.

WHEREFORE it is respectfully requested that the information sought by defendant pursuant to *Federal Rule of Criminal Procedure 32.1(a)(2)(B)* be provided.

RESPECTFULLY REQUESTED.

In San Juan, Puerto Rico, April 25th, 2005.

JOSEPH C. LAWS, JR.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 28th , 2004 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the government, U.S. Attorney H.S. García, and the U.S. Probation Office (Luis O. Encarnación).

At San Juan, Puerto Rico, this 25th day of April, 2005.

JOSEPH C. LAWS, JR
Federal Public Defender
District of Puerto Rico

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